

Synthetic Minor Operating Permit Application Evaluation Report
CPI-Eimac Corporation
Application #16513
Plant #10521

Background:

CPI-Eimac (previously Varian Corporation, plt 587) originally submitted an Permit Application for a Synthetic Minor permit. Soon after this submission, CPI-Eimac discovered that significant portions of the Salt Lake facility were to be moved to the Bay Area. In light of the expected increased resource needs, CPI withdrew their synthetic minor application in favor of a Title V permit application. After installing the Salt Lake Equipment it became obvious to CPI that a Title V permit is not required. Instead CPI-Eimac can qualify for a Synthetic Minor permit as long as they are willing to accept lowered limits on their usages of TCE.

The facility was subject to Regulation 2 Rule 6, because the total permitted level of TCE emissions was approximately 14 tons per year. Actual usage of TCE was well below 10 tpy. The combined estimated actual emissions of criteria pollutants is less than the Title V thresholds.

Source	Compound Emitted	Conditioned
S-4 Abrasive Blast Op	Negligible particulate	Exempt per 2-1-105.1
S-5 Pyrovac Spray Booth	Organics	15076
S-6 Cathode Spray Coating	Organics	Condition needed
S-17 Storage Tank	TCE	14544
S-18 Storage Tank	TCE	14544
S-19 Storage Tank	TCE	14544
S-25 Coating Mix Room	Organics	15077
S-49 IPA Vapor Dryer	Organics	13992
S-61 Cathode Spray Coating Ops	Organics	Condition needed
S-62 Cathode Spray Booth	Organics	14173
S-71 Dry Belt Grinder/Radial Saw	Negligible particulate	Exempt 2-1-121.1
S-73 Wet Blast Crohone Op	Negligible particulate	Exempt 2-1-118.2
S-74 Cleaning and Plating	Negligible particulate	Exempt 2-1-118.5
S-75 Cleaning and Plating	Negligible particulate	Exempt 2-1-118.5
S-76 Cleaning and Plating	Negligible particulate	Exempt 2-1-118.5
S-79 MeOH Storage Tanks (3)	Organics? MeOH? IPA	
S-83 Graphite Machining Equip	Negligible particulate	Exempt
S-85 HCL Storage Tank	HCL aerosol	
S-115 Cold Solvent Cleaner	Organics	
S-116 Metallizing Adhesive Mfr	Organics	
S-119 Metallizing Adhesive Coating	Organics	
S-120 Metallizing Adhesive Coating Drying	Organics	N/A
S-122 Cathode Spray Paint Mfr	Organics	
S-127 Vapor Degreaser	TCE	13818
S-128 Open Top Degreaser	TCE	13818
S-129 Abrasive Blasting	Particulate	8758
S-130 Abrasive Blasting	Particulate	8758
S-131 Abrasive Blasting	Particulate	8758
S-203 Wipe Cleaning Operation	Organics	
S-501 Cold Cleaning Operation (citrus)	None	Exempt
S-502 Vapor Degreaser	TCE	13818
S-503 Vapor Degreaser	TCE	13818
S-504 Wire Coater	Organics	15036
S-505 Wire Coater	Organics	15037

Emission Limits Strategy

To obtain a synthetic minor permit, a facility must have federally enforceable emission limits that keep the potential to emit below 95 tons per year of any regulated air pollutant, below 9 tons per year of any single HAP, and below 23 tons per year of any combination of HAPs.

A listing of the HAPs currently in use at CPI-Eimac is as follows:

TCE
Methanol
Ethylene Glycol
MEK
TCA

The only HAP with emissions even approaching 9 tpy was TCE. Accordingly, BAAQMD was poised to grant a Synthetic Minor Permit to the CPI-Eimac facility with the provision that TCE emissions would be kept far below the 9 tpy level. While working on this permit application, CPI embarked on a study to examine the feasibility of changing out the TCE solvent sources in exchange for Abzol EG (n-propyl bromide based solvent). Based on the results of their test study, CPI has decided to discontinue using TCE and to use Abzol EG solvent cleaner.

This synthetic minor analysis will explore HAP emissions, organic emissions, and particulate emissions.

HAP Emissions - Trichloroethylene: The main HAP of interest in this evaluation is trichloroethylene (TCE). TCE is emitted from the following sources: S-17, S-18, S-19 (storage tanks), S-127, S-128 degreasers, and S-502 and S-503 vapor degreasers. TCE use is being eliminated (in this permit application) in favor of Abzol EG solvent (n-propyl bromide based solvent). Therefore, there will be no TCE emissions at this facility. The replacement solvent Abzol EG, contains approximately 94% n-propyl bromide and 6% proprietary ethers. N-propyl bromide is not listed as a HAP. Ethers may be HAP compounds depending on the specific compound, and the quantities emitted. There are no HAP emissions exceeding any thresholds for any other compounds.

S-17 – S-19 tanks will be allowed 1,500 gal/yr of Abzol EG solvent throughput per tank.

The solvent degreasers will be allowed the following: S-127: 525 gal/yr. S-128: 675 gal/yr. S-502: 375 gal/yr. S-503: 375 gal/yr. Precursor emissions will be reduced by approximately 12%. The combined total POC emissions from these sources pre and post project are 54,765 lb/yr (27.38 tpy) and 48,281 lb/yr (24.14 tpy) respectively.

HAP Emissions - Methanol: Methanol use is now limited to S-5, S-25, S-79, S-115, S-203, S-504, and S-505. S-115 and S-203 will be conditioned to limit methanol emissions. Methanol use is being discontinued at S-79 in favor of IPA. The rest of the sources are conditioned to a maximum MeOH usage. These limits will continue.

HAP Emissions - HCL: S-85 is the hydrochloric acid storage tank. Acid is pumped from this tank to the plating tanks (S-74, S-75, S-76). The area around the plating tanks is abated by packed bed scrubbers A101 and A102 to minimize HCL that may be evaporated from the tanks. The only real source of HCL emissions is from the venting operation of S-85 storage tank during filling operations. Maximum annual usage is 148 tpy. Worst case emissions (based on AP-42 factors for manufacture) presents an emission rate of 450 lb/yr (3lb/ton). The fact is that emissions of HCL mist will be minimal. HCL has a very low volatility, the tank

is managed in a quiescent state, HCL vapors are very irritating, problematic, and the lack of problems stemming from this operation indicates emissions are low. A condition will be established limiting throughput to 148 tpy.

HAP Emissions - MEK: MEK is used at S-119. A usage limit will be established at S-119.

Precursor Organic Emissions: non-TCE Sources: The following sources have emissions of organics (other than TCE): S-5*, S-6, S-25*, S-49*, S-61, S-62*, S-79, S-115, S-116, S-122, S-203, S-501, S-504*, S-505*. The above sources with asterisks already have permit conditions limiting their organic emissions. The above sources without asterisks will be evaluated – and conditions established to limit the organic emissions.

Based on emission limits specified in the current permit conditions, as well as maximum usages specified in the database for these sources, the current POC emissions breakdown is as follows:

Pre-TCE Elimination

POC Emissions (including TCE): 44.4 tpy [maximum]
TCE Emissions (current permitted): 14.02 tpy [maximum]
POC Emissions (minus TCE): 30.4 tpy

Post-TCE Elimination

POC Emissions 38.9 tpy [maximum]

Net Reduction- POC: 5.5 tpy

TCE emissions are eliminated by the switch to Abzol-EG solvent and overall POC emissions reduced by 5.5 tpy (12.4%).

POC Emissions – IPA: S-79 is a series of 3 cold cleaner tanks. Each tank is 22.5" X 22.5" X 36" deep. Therefore total surface area is 10.53 sq ft. Freeboard is 0.8 (18"/22.5"). File 35 lists emissions of 1998 gal/yr of IPA (13,047 lb/yr). Since MeOH is being phased out, IPA emissions will increase. The new IPA limit will be 2,500 gal/yr or 16,325 lb/yr (8.163 tpy). This usage limit will be established. POC emissions from this source will be reduced from 10.38 tpy to 8.163 tpy.

Particulate Emissions: The following sources have emissions of particulates (sources with asterisks already have conditions limiting their emissions): S-4, S-71*, S-73*, S-83*, S-129, S-130, S-131. All these sources are either abrasive blasting sources or have some emissions of particulates. All of the sources are part of the process for the manufacture of small electrical parts. Hence it would not be expected that there would be high emissions. *In addition to low expected emission levels, S-4 is abated by A-17 dust collector, S-73 is abated by A-5 cyclone, S-71 is abated by A-3 dust collector and S-83 is abated by A-15 irrigated cyclone scrubber

Sources S-129, S-130 and S-131 are all abrasive blasting sources and would be expected to have the highest emissions of all particulate sources. Although there are no limits associated with these sources, the maximum throughput listed in the District database for these sources are 1.5 ton/yr per source. Even if 100% of the abrasive throughput was emitted, annual emissions would be less than 5 tpy. Particulate emissions are considered regulated emissions and have a synthetic minor threshold of 95 tpy. It is highly unlikely that total particulate emissions from these sources could ever approach the 95 tpy particulate synthetic minor threshold. Synthetic minor permit conditions limiting particulate emissions are unnecessary at S-4, S-71, S-73, S-83, S-129, S-130, S-131.

Miscellaneous Aerosols: Aqueous aerosols are emitted from the following sources: S-73 wet blast crohone operation, S-74 Cleaning and Plating, S-75 Cleaning and Plating, S-76 Cleaning and Plating. There would be minimal emissions (slight process odors) or emissions from cleaning bath and plating operations. Emissions from these sources are very small- and are mainly water evaporation. Synthetic minor permit conditions are not required for S-73, S-74, S-75, and S-76.

Existing non-conditioned POC sources (S-6, S-61, S-79, S-115, S-116, S-119, S-120, S-122, S-203, S-501)

The following emissions were estimated from the original permit application or from District database throughput limits.

S-6 Cathode Spray Coating Operations (4 booths), abated by A-7 scrubber:

File 35 lists the following substances and respective maximum usages:

Acetone (455) 207 gpy 6.6 lb/gal 1366 lb/yr

Max solvents in coatings(file 33):

Coating #1

EtOH (105) 31 lb/yr 4.6 gpy

IPA (157) 1.4 lb/yr 0.2 gpy

Coating #2

Butyl acetate (048) 6.2 lb/yr 0.84 gpy

Isopropyl acetate (156) 7 lb/yr 0.96 gpy

S-6 Summary Table	Limits
Acetone (455)	1366 lb/yr
EtOH (105)	31 lb/yr
IPA (157)	1.4 lb/yr
Butyl acetate (048)	6.2 lb/yr
Isopropyl acetate (156)	7 lb/yr
Total POC	46 lb/yr
Total HAP Solvents	None

S-61 Cathode Spray Coating Operations (5 booths)

File 35 lists the following substances and respective maximum usages:

Acetone (455) 258 gpy 6.6 lb/gal 1703 lb/yr

Max solvents in coatings (file 33):

Coating #1

EtOH (105) 70 lb/yr 10.6 gpy

IPA (157) 2.94 lb/yr 0.4 gpy

Coating #2

Butyl acetate (048) 6.2 lb/yr 0.84 gpy

Isopropyl acetate (156) 7 lb/yr 0.96 gpy

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S-61 Summary Table	Limits
Acetone (455)	1703 lb/yr
EtOH (105)	71 lb/yr
IPA (157)	3.3 lb/yr
Butyl acetate (048)	6.2 lb/yr
Isopropyl acetate (156)	7 lb/yr
Total POC	88 lb/yr
Total HAP Solvents	None

S-79 Methanol Cleaning Tanks (3 tanks)

File 35 lists following substances and respective maximum usages:

IPA (157) 1998 gpy 6.53 lb/gal 13,047 lb/yr

MeOH (179) 1169 gpy 6.6 lb/gal 7,715 lb/yr

MeOH is no longer used at this source. CPI-Eimac has indicated they need a maximum of 2,500 gal/yr of IPA.

S-79 Summary Table	Limits
IPA (157)	16,325 lb/yr
Total POC	8.16 ton/yr
Total HAP Solvents	None

S-115 Cold Solvent Cleaner

File 35 lists the following substance and respective maximum usages:

IPA (157) 666 gpy 6.53 lb/gal 4349 lb/yr

MeOH (179) 105 gpy 6.6 lb/gal 693 lb/yr

S-115 Summary Table	Limits
IPA (157)	4349 lb/yr
Methanol (179)	693 lb/yr
Total POC	5,042 lb/yr
Total HAP Solvents	693 lb/yr

S-116 Metallizing Adhesive Manufacture

File 35 lists the following substances and respective maximum usages:

Acetone (455) 25 gpy 6.6 lb/gal 165 lb/yr

HC-other (318) 31 gpy 6.51 lb/gal 202 lb/yr

S-116 Summary Table	Limits
Acetone (455)	165 lb/yr
HC-Other (318)	202 lb/yr
Total POC	202 lb/yr
Total HAP Solvents	None

S-119 Metallizing Adhesive Coating Operations

File 35 lists the following substances and respective maximum usages:

HC-Other (318)	8 gpy	6.6 lb/gal	53 lb/yr
Acetone (455)	179 gpy	6.6 lb/gal	1181 lb/yr

Max solvents in coatings (file 33):

Coating #1:

Acetone (455)	7.7 lb/yr	1.01 gpy
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Coating #2:

Diethylene Glycol Monoethyl Ether (58)	164 lb/yr	20 gpy
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Alcohol – other (228)	38 lb/yr	5.6 gpy
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Coating #3:

Ethylene Glycol Monoethyl Ether (62)	32 lb/yr	(4.4 gpy)
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MEK (169)	33 lb/yr	(5 gpy)
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S-119 Summary Table	Limits
Acetone (455)	1189 lb/yr
HC-Other 9318)	53 lb/yr
DEGME (58)	164 lb/yr
Alcohol (228)	38
EGME (62)	32 lb/yr
MEK (169)	27 lb/yr
Total POC	314 lb/yr
Total HAP Solvents	27 lb/yr

S-122 Cathode Spray Paint Manufacture

File 35 list the following substances and respective maximum usages:

HC-Other (318)	183 gpy	6.51 lb/gal	1191 lb/yr
Acetone (455)	74 gpy	6.6 lb/yr	488 lb/yr

S-122 Summary Table	Limits
Acetone (455)	488 lb/yr
HC-Other 9318)	1191 lb/yr
Total POC	1191 lb/yr
Total HAP Solvents	None

S-203 Wipe Cleaning Operation

File 35 lists the following substances and respective maximum usages:

Kerosene (159)	100 gpy	7.0 lb/gal	700 lb/yr
Acetone (455)	147 gpy	6.6 lb/yr	970 lb/yr
TCA (565)	no longer in use		
MeOH (179)	83 gpy	6.6 lb/gal	548 lb/yr

S-203 Summary Table	Limits
Acetone (455)	970 lb/yr
Kerosene (159)	700 lb/yr
Methanol	548 lb/yr
Total POC	1248 lb/yr
Total HAP Solvents	548 lb/yr

HAP Calculations – Final Emissions Limits

TCE Sources – Revised Conditions: The following table lists the sources of TCE along with the current estimated maximum (or conditioned maximum) – and the future conditioned maximum for each source (or group of sources):

	<u>Current-TCE</u>	<u>Condition Status</u>
S-17, S-18, S-19	1329 lb/yr (8,000 gpy)	14544/revise
S-127	4331 lb/yr (355 gpy)	13818/revise
S-128	5795 lb/yr (475 gpy)	13818/revise
S-502	10,370 lb/yr (850 gpy)	13818/revise
S-503	<u>6,222</u> lb/yr (510 gpy)	13818/revise
	28,047 lb/yr (14 tpy)	

Desired Uses – Abzol EG (n-propyl bromide ~94%, ethers ~6%)

	<u>Throughput</u> (gpy)	<u>Emissions-nPB</u>	<u>Emissions -</u>
<u>Ethers</u>			
S-17, 18, 19	4,500 (1,500 each)	171 lb/yr	9 lb/yr
S-127	525	5567	190
S-128	675	7157	245
S-502	375	3976	136
S-503	<u>375</u>	<u>3976</u>	<u>136</u>
		20,847 lb/yr	716 lb/yr

Methanol Sources: Methanol emissions showing current conditions are as follows:

	<u>Current</u>	<u>Future</u>	<u>Condition Status</u>
S-5	204 lb/yr (31 gpy)	204 lb/yr	15076/no change
S-25	66 lb/yr (10 gpy)	66 lb/yr	15077/no change
S-115	none	693 lb/yr	new condition
S-203	548 lb/yr (83 gpy)	548 lb/yr gpy	new condition
S-504	640 lb/yr (97 gpy)	640 lb/yr	15036/no change
S-505	640 lb/yr (97 gpy)	<u>640 lb/yr</u>	15037/no change
	Total MeOH	2,098 lb/yr	

HCL Sources:

	<u>Current</u>	<u>Future</u>	<u>Condition Status</u>
S-85	no condition	148 tpy	new condition

MEK Sources:

	<u>Current</u>	<u>Future</u>	<u>Condition Status</u>
S-119	no condition	4.1 gpy	new condition

Emissions Summary

	PRE-SYNTHETIC MINOR APP	POST SYNTHETIC MINOR APP
TCE (HAP)	14.0	0
Other HAP	5.27	5.27
TOTAL HAP	19.3	5.27
POC	44.4	38.9
Particulate	Negligible (<<<2 tpy)	Negligible (<<<2 tpy)

Compliance with the Halogenated Solvents NESHAP

Sources S-127, S-128, S-502, and S-503 are all batch vapor cleaners using TCE and are all subject to the halogenated solvents NESHAP (MACT) standard. However, since the use of TCE is being eliminated, the halogenated solvents NESHAP is no longer applicable to these sources.

Permit Conditions

Individual Sources Conditions (to be archived): The following permit conditions shall be archived in lieu of a single condition for all sources.

Condition 15076	S-5
Condition 14544	S-17, S-18, S-19
Condition 15077	S-25
Condition 13992	S-49
Condition 14173	S-62
Condition 13818	S-127, S-128, S-502, S-503
Condition 8758	S-129-S-131
Condition 15036	S-504
Condition 15037	S-505

NOTE: Asterisks denote permit conditions that are part of this permit but do not contribute to establishing the synthetic minor limits. The facility must comply with all conditions, regardless of asterisks. The following conditions do not negate the applicability of any District, state, or federal requirements."

Facility Wide Condition --- CONDITION 16970**SYNTHETIC MINOR OPERATING PERMIT**

CPI-EIMAC
301 Industrial Way
San Carlos, CA 94070
Plant B0521

Conditions 1a-h, 2a, 2c, 3a-c, 4a-b, 5a-c, 6, 7a-b, 8a-b, 9b-d, 10a-b, 11a-d, 12a-b, 13a-c, 14a-b, 15a-c, 16a-e, 16j, 18a, and 19a establish the permit terms that ensure this plant is classified as a Synthetic Minor Facility under

District Regulation 2, Rule 6 - Major Facility Review and ensure it is not subject to the permitting requirements of Title V of the Federal Clean Air Act as amended in 1990 and 40 CFR Part 70. Any revision to a condition establishing this plant's status as a Synthetic Minor Facility or any new permit term that would limit emissions of a new or modified source for the purpose of maintaining the facility as a Synthetic Minor must undergo the procedures specified by Rule 2-6, Section 423. The basis for the synthetic minor condition is an emission limit for regulated pollutants of less than 95 tons per year, an emission limit for a single hazardous air pollutant of less than 9 tons per year, and an emission limit for a combination of hazardous air pollutants of less than 23 tons per year.

Conditions 2b, 2e, 11d, 15c, 9a, 16f-i, 17a-b, 18b-d, and 19b-d are District conditions that do not establish this facility as a Synthetic Minor. Each of these conditions is marked by an asterisk. The facility must comply with all conditions, regardless of asterisks, and must comply with all District requirements for new and modified sources regardless of its status as a Synthetic Minor.

This operating permit covers all sources existing at the facility as of permit issuance. The sources are listed below:

- S-4 Abrasive Blast Operations, 9 Stations,
Bldg 1
- S-5 Pyrovac Spray Booth
- S-6 Cathode Spray Coating Operations
(4 booths)
- S-17 Trichloroethylene Storage
- S-18 Trichloroethylene Storage
- S-19 Trichloroethylene Storage
- S-25 Coating Mixing Room
- S-49 Isopropyl Alcohol Vapor Dryer
- S-61 Cathode Spray Coating Operations (5
booths)
- S-62 Cathode Spray Booth
- S-71 Dry Belt Grinder & Radial Saw [exempt]
- S-73 Wet Blast Crohone Operation [exempt]
- S-74 Cleaning & Plating [exempt]
- S-75 Cleaning & Plating [exempt]
- S-76 Cleaning & Plating [exempt]
- S-79 3- Methanol Cleaning Tanks
- S-83 Graphite Machining Equipment
- S-85 Hydrochloric Acid Storage
- S-115 Cold Solvent Cleaner
- S-116 Metallizing Adhesive Manufacture
- S-119 Metallizing Adhesive Coating Operations
- S-120 Metallizing Adhesive Coating Drying
- S-122 Cathode Spray Paint Manufacture

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S-127 Vapor Degreaser
S-128 Open Top Vapor Degreaser
S-129 Abrasive Blasting
S-130 Abrasive Blasting
S-131 Abrasive Blasting
S-203 Wipe Cleaning Operation
S-501 Cold Cleaning Operation
S-502 Enclosed Vapor Degreaser 2/automtd hoist
S-503 Enclosed Vapor Degreaser 2/automtd hoist
S-504 Automatic Wire Coating Machine w/
electric dryer
S-505 Automatic Wire Coating Machine w/
electric dryer

A-1 Dust Collector
A-3 Dust Collector
A-5 Cyclone Dust Collector
A-7 Mist Eliminator Scrubber
A-12 Mist Eliminator Scrubber
A-14 Mist Eliminator
A-15 Roto Clone, 2 1/2 Type N, Model B
A-17 Dust Collector
A-101 Fume Scrubber
A-102 Fume Scrubber
A-127 Solvent Recovery Treatment

1. CPI-EIMAC Facility-Wide Conditions

- a. Emissions of any single hazardous air pollutant (HAP) from all sources combined shall be no greater than 9 tons per any consecutive twelve-month Period.
- b. Emissions of any combination of HAPS from all sources combined shall be less than 23 tons per any consecutive twelve-month period.
- c. Prior to changing any solvent formulation as specified in any of the following conditions, CPI-EIMAC shall apply for and receive an Authority to Construct/ Permit to Operate for the modified Source. [Basis: Reg 2-1-301, 302]

The use of the new materials or formulations shall not increase toxic emissions above any risk screening trigger level as specified in Table 2-1-316.
[Basis: Reg 2 Rule 1]
- d. Acetone usage shall not be used for the purpose of calculating POC emissions.
- e. Recordkeeping: CPI-EIMAC shall keep

and maintain District approved solvent usage logs that list the throughputs of all coatings and solvents from all non-combustion sources. The daily logs shall be summarized on a calendar month basis. The coating and solvent usage shall be summarized separately on a source by source basis and collectively to demonstrate compliance with condition items 2-20 and items 22-23. Annual emissions of regulated and hazardous air pollutants shall be tabulated at the end of each calendar month on a running 12 month basis.

- f. Records Retention: All records shall be retained on-site for five years, from the date of entry, and made available for inspection by District staff upon request.
- g. Reporting: An annual report shall be prepared and submitted to the Enforcement Division of the District. The report shall contain the monthly detail and annual summary of all coatings, solvents, HAPs and VOCs used during the past twelve months. This report shall be prepared for the year ending on the facility's permit renewal date and shall be submitted within two months of the annual permit renewal date. For the first year, the report will start with the synthetic minor permit issue date.
- h. Together with the annual emissions report, the facility shall submit an annual certification of compliance, signed by the facility's responsible official. The Certification shall read: " I certify the following: based on information and belief formed after reasonable inquiry, the facility has been in compliance with the synthetic minor conditions for the specified period of time:

2. Conditions for S-5 Pyrovac Spray Booth

a. Usage Limits

Usage of coating and cleanup solvent at S-5 Pyrovac Spray Booth shall not exceed the following limits, in any consecutive twelve month period:

[Basis: Cumulative Increase]

1. Pyrovac Spray Coating: 156 gal
2. Cleanup Solvent: Methanol: 31 gal

*b. Pyrovac Spray Booth Coating Composition

Total VOC content of any Pyrovac spray booth coating (as applied at S-5) shall not exceed 670 grams per liter.

[Basis: Reg 8-19-312.13]

c. Alternative Coating/Cleanup Solvent

Coatings and cleanup solvents other than the materials specified in item a, above, may be used at S-5, provided that the owner/operator can demonstrate that total POC emissions from S-5 do not exceed 10 lb/operating day and that no new HAPs are used.

[Basis: BACT, TBACT]

- d. Prior to using any new HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.

*e. Limited Exemption Qualification

To maintain ongoing qualification with the limited exemption specified in Regulation 8-19-136.4 for the use of high performance zirconium slurry coating, CPI shall comply with the following annual requirements [Reg 8-19-407]:

1. A petition shall be submitted to the APCO containing the following information, as applicable: performance requirements, job order description, volume of coating, and maximum VOC level necessary.
2. The above petition shall be submitted on an annual basis (at least one time per calendar year).

3. Conditions for S-6 Cathode Spray Coating

- a. Total POC emissions shall not exceed 46 lb in any consecutive 12 month period.
- b. This source shall not be operated unless all emissions are vented to and abated by A-7 scrubber.

- c. Prior to using any HAP at this source the facility shall first apply to and receive from the District a change in permit conditions.
- 4. Conditions for S-17, S-18, S-19 Storage Tanks
 - a. The total throughput for Storage Tanks S-17, S-18, and S-19 shall not exceed 4500 gallons total of Abzol EG during any consecutive 12 month period.
 - b. CPI-EIMAC shall keep and maintain records of the type and VOC content of all materials stored and the dates that the materials were stored.
- 5. Conditions for S-25 Coating Mixing Room
 - a. Usage Limits

Usage of cleanup solvent at S-25 Coating Mixing Room shall not exceed the following limits, in any consecutive twelve month period:
[Cumulative Increase]

 - 1. Cleanup Solvent: Methanol: 10 gal
 - b. Alternative Coating/Cleanup Solvent

Cleanup solvents other than the materials specified in item a, above, may be used at S-25, provided that the owner/operator can demonstrate that total POC emissions from S-25 do not exceed 10 lb/operating day.
 - c. Prior to using any HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.
- 6. Conditions for S-49 IPA Vapor Dryer
 - a. Net solvent usage of IPA (isopropyl alcohol) shall not exceed 150 gallons during any consecutive 12 month period.
- 7. Conditions for S-61 Cathode Spray Coating Operations
 - a. Total POC emissions shall not exceed 88 lb in any consecutive 12 month period.

- b. Prior to using any HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.

8. Conditions for S-62 Cathode Spray Booth

- a. Net usage of coating and cleanup solvents at S-62 shall not exceed 4121 pounds in any consecutive twelve month period.
- b. Prior to using any HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.

9. Conditions for S-79 Cleaning Tanks

- *a. Freeboard ratio shall be maintained at or above 0.75, with the maximum solvent reservoir capacity clearly marked by a suitable mechanical or physical means. [Basis: 8-16-303.4.1]
- b. Net usage of IPA at S-79 shall not exceed 2500 gallons during any consecutive 12 month period. [Basis: Cumulative Increase]
- c. Solvents other than IPA may be used at S-79 provided that CPI/EIMAC can demonstrate that total POC emissions from S-79 do not exceed 16325 lb in any consecutive twelve month period.
- d. Prior to using any HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.

10. Conditions for S-85 HCL Storage Tank

- a. Net throughput of HCL shall not exceed 148 tons of HCL in any consecutive 12 month period.
- b. CPI-EIMAC shall keep and maintain records of all materials stored and the dates that the materials were stored.

11. Conditions for S-115 Cold Solvent Cleaner

- a. POC emissions shall not exceed 5042 lb in any consecutive 12 month period. [Basis: Cumulative Increase]

- b. Net usage of methanol shall not exceed 105 gallons in any consecutive 12 month period.
 - c. HAP emissions shall not exceed 693 lb in any consecutive 12 month period.
 - d. Prior to using any new HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.
- 12. Conditions for S-116 Metallizing Adhesive Manufacture
 - a. POC emissions shall not exceed 202 lb in any consecutive 12 month period.
[Basis: Cumulative Increase]
 - b. Prior to using any HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.
[Basis: Cumulative Increase]
- 13. Conditions for S-119 Metallizing Adhesive Coating
 - a. POC emissions shall not exceed 314 lb in any consecutive 12 month period.
[Basis: Cumulative Increase]
 - b. Net usage of MEK shall not exceed 5 gallons in any consecutive 12 month period.
 - c. HAP emissions shall not exceed 33 lb in any consecutive 12 month period.
[Basis: Cumulative Increase]
- 14. Conditions for S-122 Cathode Spray Paint Manufacture
 - a. POC emissions shall not exceed 1191 lb in any consecutive 12 month period.
[Basis: Cumulative Increase]
 - b. Prior to using any HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.
[Basis: Cumulative Increase]
- 15. Conditions for S-203 Wipe Cleaning Operation

- a. POC emissions shall not exceed 1248 lb in any consecutive 12 month period.
[Basis: Cumulative Increase]
 - b. Net usage of methanol shall not exceed 83 gallons in any consecutive 12 month period.
 - c. Prior to using any new HAP at this source, the facility shall first apply to and receive from the District a change in permit conditions.
16. Conditions for S-127, S-128, S-502, S-503 Vapor Degreasers
- a. No TCE may be used at these sources.
 - b. Solvent Usage - S-127 Vapor Degreaser:
(Basis: Reg 2 Rule 6)
 - 1. Net solvent usage of Abzol EG shall not exceed 525 gallons during any consecutive 12 month period for S-127.
 - 2. Solvents other than Abzol EG may be used at S-127 provided that CPI/EIMAC can demonstrate that total POC emissions from S-127 do not exceed 5757 pounds in any consecutive twelve month period and that no HAPs are used.
 - c. Solvent Usage - S-128 Vapor Degreaser:
(Basis: Reg 2 Rule 6)
 - 1. Net solvent usage of Abzol EG shall not exceed 675 gallons during any consecutive 12 month period for S-128.
 - 2. Solvents other than Abzol EG may be used at S-128 provided that CPI/EIMAC can demonstrate that total POC emissions from S-128 do not exceed 7402 pounds in any consecutive twelve month period and that no HAPs are used.
 - d. Solvent Usage - S-502 Vapor Degreaser:
(Basis: Reg 2 Rule 6)
 - 1. Net solvent usage of Abzol EG shall not exceed 375 gallons during any consecutive 12 month period for S-502.
 - 2. Solvents other than Abzol EG may be used at S-502 provided that CPI/EIMAC can demonstrate that total POC emissions from S-502 do not exceed 4112 pounds in any consecutive twelve month period and that no HAPs are used.

e. Solvent Usage - S-503 Vapor Degreaser:
[Basis: Reg 2 Rule 6]

1. Net solvent usage of Abzol EG shall not exceed 305 gallons during any consecutive 12 month period for S-503.
2. Solvents other than Abzol EG may be used at S-503 provided that CPI/EIMAC can demonstrate that total POC emissions from S-503 do not exceed 4112 pounds in any consecutive twelve month period and that no HAPs are used.

*f. These sources shall not be operated unless a freeboard ratio of at least 0.75 is maintained.
(Basis: Reg 8-16-301.4.1)

*g. Sources S-127, S-128, S-502, and S-503 shall not be operated unless equipped with an automated parts handling system hoist with speeds not to exceed 11 feet per minute.
(Basis: Reg 8-16-301.1.6)

*h. Sources S-127, S-128, S-502, and S-503 shall not be operated unless the following Work and Operational practices are used:
(Basis: Reg 8-16)

- *1. The vapor solvent cleaning equipment and emission control device is operated and maintained in good working order.
- *2. The parts baskets or the parts being cleaning shall not occupy more than 50 percent of the solvent/air interface area unless introduced at a speed of 3 ft per minute or less.
- *3. Any spraying operations shall be done at least 10 cm below the top of the vapor zone.
- *4. Parts shall be oriented so that the solvent drains from them freely. Parts with cavities shall be tipped or rotates before being removed from the machine.
- *5. Parts shall not be removed from the vapor cleaning machine unless dripping has stopped.
- *6. During shutdown periods, the sump heater shall be turned off and the solvent vapor layer allowed to

collapse before the primary condenser is turned off.

- *7. When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or leakproof couplings and the end of the solvent sump shall be located beneath the liquid solvent surface.
- *8. Each solvent cleaning machine shall be maintained as recommended by the manufacturer.
- *9. Waste solvent and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a pressure relief, while not allowing liquid solvent to drain from the container.
- *10. Porous materials shall not be cleaned in any of these solvent cleaners.

*i. Monitoring & Recordkeeping:

CPI/EIMAC shall monitor vapor degreaser operations and maintain appropriate records to demonstrate compliance with items b-e of Condition 16.

j. Exceedances

CPI/EIMAC shall determine if an exceedance has occurred as a result of non-compliance with any of the above permit condition items b-e of Condition 16. CPI/EIMAC shall report all exceedances as well as any corrections or adjustment made. (Basis: Reg 1-411)

*17. Conditions for S-129, S-130, S-131

- *a. Emissions from Abrasive Blasting Cabinets S-129 to S-131 shall be abated by the properly maintained Dust Collector A-17 at all times that S-129 to S-131 are in operation.
- *b. The Operator of S-129 to S-131 shall maintain the following records in a District approved log. These records shall be kept on site and made available for District inspection for a period of 5 years from the date that the record was made.

1. Monthly throughput of abrasive material.

18. Conditions for S-504 Wire Coater

a. Usage Limits

Usage of coating and cleanup solvent at S-504 shall not exceed the following limits, in any consecutive twelve month period:

(Basis: BACT, Reg 8-19-136.4)

1. Zirconium Slurry Coating: 23 gal
2. Remix Thinning Solvent: 104 gal
3. Cleanup Solvent-Methanol: 97 gal

*b. Zirconium Slurry Coating Composition

Total VOC content of fresh zirconium slurry coating (as applied at S-504) shall not exceed 750 grams per liter.
(Basis: Reg 8-19-136.4)

*c. Alternative Coating/Cleanup Solvent Usage

Coatings and cleanup solvents other than the materials specified in item a, above, may be used at S-504, provided that the owner/operator can demonstrate that total POC emissions from S-504, do not exceed 10 lb per operating day and that no new HAPS are used.

*d. Limited Exemption Qualification

To maintain ongoing qualification with the limited exemption specified in Regulation 8-19-136.4 for the use of high performance zirconium slurry coating, CPI/EIMAC shall comply with the following annual requirements
(Basis: Reg 8-19-407):

1. A petition shall be submitted to the APCO containing the following information, as applicable:
performance requirements, job order description, volume of coating, and maximum VOC level necessary.
2. The above petition shall be submitted on an annual basis
(at least one time per calendar year).

19. Conditions for S-505

a. Usage Limits

Usage of coating and cleanup solvent at S-505 shall not exceed the following limits, in any consecutive twelve month period:
(Basis: BACT, Reg 8-19-136.4)

1. Zirconium Slurry Coating: 23 gal
2. Remix Thinning Solvent: 104 gal
3. Cleanup Solvent-Methanol: 97 gal

*b. Zirconium Slurry Coating Composition

Total VOC content of fresh zirconium slurry coating (as applied at S-505) shall not exceed 750 grams per liter.
(Basis: Reg 8-19-136.4)

*c. Alternative Coating/Cleanup Solvent Usage

Coatings and cleanup solvents other than the materials specified in Condition 1 may be used at S-505, provided that the owner/operator can demonstrate that total POC emissions from S-505, do not exceed 10 lb per operating day and that no new HAPs are used.

*d. Limited Exemption Qualification

To maintain ongoing qualification with the limited exemption specified in Regulation 8-19-136.4 for the use of high performance zirconium slurry coating, CPI shall comply with the following annual requirements.
(Basis: Reg 8-19-407):

1. A petition shall be submitted to the APCO containing the following information, as applicable: performance requirements, job order description, volume of coating, and maximum VOC level necessary.
2. The above petition shall be submitted on an annual basis (at least one time per calendar year)

Statement of Compliance:

CPI-Eimac [Plant 10521]

AN 16513

05/08/00, 21

Revising the permit conditions of this facility puts the facility in compliance with the necessary requirements in Regulation 2, Rule 6 to obtain a synthetic minor permit. CPI-Eimac has voluntarily accepted federally enforceable permit conditions including emission limits that will keep the CPI-Eimac's potential to emit under 95 tons per year of any regulated air pollutant, 9 tons of any hazardous air pollutant, and 23 tons of any combination of hazardous air pollutants.

Halogenated Solvents NESHAP Sources S127, S128, S502, and S503 are no longer subject to the halogenated solvents NESHAP since they no longer use halogenated solvents. Operating conditions have been written to ensure halogenated HAP solvents are not used and that POC emissions remain at or below current levels.

By: _____

Randy E. Frazier, P.E.

2 May 2000